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- and -

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Proposed Counsel to the Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
FGIC CORPORATION, ¹)	
)	Case No. 10-14215 (SMB)
Debtor.)	
)	

PROPOSED AGENDA FOR FIRST DAY HEARING

Time and Date of Hearing:	August 4, 2010 at 3:00 p.m. (Eastern Time)
Location of Hearing:	Honorable Arthur J. Gonzalez, Bankruptcy Judge Courtroom No. 523 United States Bankruptcy Court for the Southern District of New York Alexander Hamilton Custom House One Bowling Green New York, New York 10004-1408
Copies of Motions:	A copy of each pleading can be viewed on the Court's website at www.ecf.nysb.uscourts.gov .

¹ The last four digits of the Debtor's tax identification number are 6474. The location of the Debtor's corporate headquarters is 125 Park Avenue, New York, New York 10017.

Matters Scheduled to Be Heard at First Day Hearing

I. INTRODUCTION

- A. Pro Hac Vice Motion. Motion for Admission to Practice, *Pro Hac Vice* for Patrick J. Nash [Docket No. 14]
- B. First Day Declaration. Declaration of John S. Dubel Pursuant to Rule 1007-2 of the Local Bankruptcy Rules for the Southern District of New York in Support of First Day Motions [Docket No. 8]

II. PROCEDURAL MOTIONS

- A. Notice and Claims Agent Retention. Debtor's Application for Entry of an Order Authorizing the Employment and Retention of the Garden City Group, Inc. as Notice and Claims Agent [Docket No. 7]
- B. Case Management Motion. Debtor's Motion for Entry of an Order (a) Establishing Certain Notice, Case Management and Administrative Procedures and (b) Scheduling Disclosure Statement Hearing and Approving Notice Thereof [Docket No. 6]
- C. Bar Date Motion. Debtor's Motion for Entry of an Order (a) Establishing the Deadlines for Filing Proofs of Claim and Requests for Payment Under Section 503(b)(9) of the Bankruptcy Code, (b) Approving Procedures for Filing Proofs of Claim and (c) Approving the Form and Manner of Notice Thereof [Docket No. 10]

III. OPERATIONAL MOTIONS

- A. Cash Management Motion. Debtor's Motion for Entry of Interim and Final Orders (a) Authorizing the Debtor to Continue Using its Existing Bank Accounts and Business Forms, (b) Granting Administrative Priority for Intercompany Claims and (c) Authorizing the Debtor to Maintain Existing Investment Practices [Docket No. 4]
- B. Claims Trading Motion. Debtor's Motion for Entry of Interim and Final Orders Establishing Claims Trading Procedures for Trading in Claims Against the Debtor's Estate *Nunc Pro Tunc* to the Petition Date [Docket No. 5]

Matters Requested To Be Scheduled For Future Hearing

IV. RETENTION APPLICATIONS

- A. K&E Retention. Debtor's Application for Entry of an Order Authorizing the Employment and Retention of Kirkland & Ellis LLP as Attorneys for the Debtors and Debtor in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. TBD]
- B. Interim Compensation Procedures. Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 9]

V. PLAN-RELATED MATTERS

- A. Disclosure Statement Motion. Debtor's Motion for Entry of an Order (a) Approving the Adequacy of the Disclosure Statement, (b) Fixing Dates and Deadlines Relating to Confirmation of the Plan, (c) Approving Certain Procedures for Soliciting and Tabulating the Votes on, and for Objecting to, the Plan and (d) Approving the Manner and Form of the Various Notices and Documents Relating Thereto [Docket No. 13]

New York, New York
Dated: August 4, 2010

/s/ Brian S. Lennon

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